

Pursuant to notice, the Missouri Real Estate Commission (“Commission”) held a hearing on October 2, 2019, at the Division of Professional Registration, 3605 Missouri Boulevard, Jefferson City, Missouri, for the purpose of determining whether Respondents had violated the disciplinary terms of a prior Commission Order and if so, whether additional discipline of Respondents’ licenses was warranted. All of the members of the Commission were present throughout the meeting, except Charles Misko was not present. The Commission was represented by Assistant Attorney General Ross Keeling. On behalf of the Commission, counsel offered the testimony of Terry W. Moore, Executive Director, and offered three (3) exhibits which were admitted into the record. Respondent Joel W. Rutherford, having received proper notice and opportunity to appear, did appear in person without legal counsel. Respondent The Rutherford Group LLC, having received proper notice and opportunity to appear, did not appear through legal counsel. After being present and considering all of the evidence presented during the hearing, the Commission issues these following Findings of Fact, Conclusions of Law, and Disciplinary Order.

I.

FINDINGS OF FACT

1. The Missouri Real Estate Commission is an agency of the state of Missouri created and established pursuant to § 339.120, RSMo.,¹ for the purpose of carrying out and enforcing the provisions of §§ 339.010 to 339.205 and 339.710 to 339.855, RSMo., and the regulations promulgated thereunder, relating to real estate salespersons and brokers.

2. Joel W. Rutherford holds Broker Associate licenses from the Commission, license numbers 2001009430 and 2018011307. Mr. Rutherford's Broker Associate licenses were not current at all times relevant to this proceeding. Mr. Rutherford's Broker Associate licenses expired on June 30, 2018. Respondent The Rutherford Group LLC holds a real estate association license, number 2012029612. The Rutherford Group LLC, was not current at all times relevant to this proceeding. The Rutherford Group LLC's real estate association license expired on June 30, 2018.

3. On October 24, 2018, the Commission issued an Order placing Mr. Rutherford's Broker Associate licenses and The Rutherford Group LLC's real estate association license on four (4) years' probation. At their own expense, Respondents were to ensure that quarterly audits of their registered escrow accounts were conducted and completed by a certified public accountant (CPA) or an accountant approved by the Commission. The Order required Respondent to renew Broker Associate license # 2001009430 and real estate association license #2012029612 within 45 days of the date of the Order and the Order required Respondents to comply with all relevant provisions of Chapter 339 RSMo., as amended; all rules and regulations of the MREC; and all local, state, and federal laws.

4. The relevant terms of the disciplinary period as stated in the Order were:

¹ All statutory references are to the Revised Statutes of Missouri, as amended, unless otherwise indicated.

- a. Section III, Paragraph A: Respondents shall, at their expense retain an approved CPA/Accountant to conduct and complete the quarterly audit reports for **TWO (2) YEARS** of the disciplinary period. Respondents shall, within fifteen (15) calendar days of the effective date of this Order submit to the Commission office in writing a list of at least three CPAs/Accountants, including name, address, and relationship to Respondents. The Commission may approve one or more the listed CPAs/Accountants or may require Respondents, on grounds that are reasonable, to submit additional names for consideration and approval. The first such quarterly audit report shall begin with the quarter ending December 31, 2018 and continue through and conclude with the quarter ending December 31, 2020. Further, within 30 days of completion of each quarterly audit report, the CPA/Accountant conducting and completing the audit report will mail to the Commission office by certified mail, return receipt requested, a signed statement from the CPA/Accountant confirming that his/her firm completed a reconciliation of the accounts and matched the reconciled balance to the check register and the total of all reported owner and/or tenant balances. All documents necessary to provide the reconciliation should be submitted with the CPA's/Accountant's statement. If the CPA/Accountant should find that the three-way reconciliation does not match, the CPA/Accountant report should include the details and documentation.
- b. Section III, Paragraph B: Respondents are hereby ordered to renew broker associate license number 2001009430 and real estate association license number 2012029612 with 45 days of the date of this order. Thereafter, Respondents shall timely renew their real estate licenses, timely pay all fees required for license renewal, and shall comply with all requirements necessary to maintain their

licenses. Respondents cannot apply for additional real estate licenses or change current licenses without the written approval of the Commission.

5. To date, Respondent Rutherford has failed to submit the names of three (3) CPA's / Accountants for MREC approval and has failed to submit quarterly CPA reports regarding registered escrow accounts, which provides cause to further discipline Respondents' licenses pursuant to Section 324.042, RSMo., and Section III, Paragraph A of the Order.

6. To date, Respondents have failed to renew broker associate license number 2001009430 and real estate association license number 2012029612, which provides cause to further discipline Respondents' licenses pursuant to Section 324.042, RSMo., and Section III, Paragraph B of the Order.

7. As a result of the foregoing, a Probation Violation Complaint was filed with the Missouri Real Estate Commission alleging that grounds existed for additional disciplinary action against Joel W. Rutherford and The Rutherford Group LLC's Missouri real estate licenses, pursuant to § 324.042, RSMo.

8. The Commission set this matter for hearing and served notice of this disciplinary hearing upon Respondents in a proper and timely fashion.

9. On October 2, 2019, pursuant to notice and § 621.110, RSMo., this Commission held a hearing at the Division of Professional Registration, 3605 Missouri Boulevard, Jefferson City, Missouri, for the purpose of determining whether the Respondents had violated any terms of the Order, and if so, whether any additional discipline would be imposed against Respondents' licenses. Respondent Joel W. Rutherford, did appear in person without legal counsel. Respondent The Rutherford Group LLC, having received proper notice and opportunity to appear, did not appear through legal counsel. Petitioner was represented by Ross Keeling, Assistant Attorney General, who presented evidence and testimony as stated on page 1 of this Order.

10. All the members of the Commission were present throughout the disciplinary hearing, except Public Member Charles Misko was not present.

II.

CONCLUSIONS OF LAW

11. Joel W. Rutherford and The Rutherford Group LLC's failure to provide quarterly audits of their registered escrow accounts, that were conducted and completed by a certified public accountant (CPA) or accountant approved by the Commission, in violation of Section III, Paragraph A of the Order is a violation of the terms of the Order which provides cause to further discipline Joel W. Rutherford and The Rutherford Group LLC's licenses under § 324.042, RSMo.

12. Joel W. Rutherford and The Rutherford Group LLC's failure to renewal broker associate license number 2001009430 and real estate association license number 2102029612 with 45 day of October 24, 2018, in violation of Section III, Paragraph B of the Order is a violation of the terms of the Order which provides cause to further discipline Joel W. Rutherford and The Rutherford Group LLC's licenses under § 324.042, RSMo.

13. Pursuant to § 324.042, RSMo., the Commission has authority to impose additional discipline against Joel W. Rutherford and The Rutherford Group LLC, for violating any disciplinary terms previously imposed or agreed to pursuant to the Order with the licensees.

14. Section 324.042, RSMo., provides:

Any board, commission or committee within the division of professional registration may impose additional discipline when it finds after hearing that a licensee, registrant or permittee has violated any disciplinary terms previously imposed or agreed to pursuant to settlement. The board, commission or committee may impose as additional discipline, any discipline it would be authorized to impose in an initial disciplinary hearing.

15. Pursuant to Section 324.042, RSMo., the Commission has jurisdiction to hold additional hearings and impose discipline if it finds that a licensee has violated any disciplinary terms previously imposed by the Commission.

16. Section 339.100.3, RSMo., provides the Commission may discipline a real estate license after an initial disciplinary hearing by revoking, probating or suspending said license.

17. The Commission finds Respondents Joel W. Rutherford and The Rutherford Group LLC's have violated the terms and conditions of the Order that became effective October 24, 2018 as a result of the conduct identified in the Findings of Fact set forth above.

18. The Commission has determined that this Order is necessary to ensure the protection of the public.

III.

ORDER

Therefore, having fully considered all the evidence before the Commission, it is the **ORDER** of this Commission that:

18. **No further discipline** be imposed against The Rutherford Group LLC, license number 2012029612.

19. The Broker Associate licenses of Joel W. Rutherford (license no. 2001009430 and 2018011307) will remain on **PROBATION** as directed in the October 24, 2018 Order. During Respondent's probation, Respondent shall be entitled to practice under his respective license provided that Respondent adheres to all of the terms stated herein. The period of probation shall constitute the "disciplinary period."

The terms and conditions of the disciplinary period are as follows:

A. Respondent shall at his expense retain an approved CPA/Accountant to conduct and complete the quarterly audit reports **within 120 days of the date of this Order**. Respondent

shall, within fifteen (15) calendar days of the effective date of this Order submit to the Commission office in writing a list of at least three CPAs/Accountants, including name, address, and relationship to Respondents. The Commission may approve one or more the listed CPAs/Accountants or may require Respondents, on grounds that are reasonable, to submit additional names for consideration and approval. The first such quarterly audit report shall begin with the quarter ending December 31, 2018 and continue through and conclude with the quarter ending December 31, 2020. Further, within 30 days of completion of each quarterly audit report, the CPA/Accountant conducting and completing the audit report will mail to the Commission office by certified mail, return receipt requested, a signed statement from the CPA/Accountant confirming that his/her firm completed a reconciliation of the accounts and matched the reconciled balance to the check register and the total of all reported owner and/or tenant balances. All documents necessary to provide the reconciliation should be submitted with the CPA's/Accountant's statement. If the CPA/Accountant should find that the three-way reconciliation does not match, the CPA/Accountant report should include the details and documentation.

B. Respondent is hereby ordered to renew broker associate license number 2001009430 with 60 days of the date of this order. Thereafter, Respondent shall timely renew his real estate license(s), timely pay all fees required for license renewal, and shall comply with all requirements necessary to maintain his license(s).

C. Respondent may close The Rutherford Group LLC and re-submit transfer documents for his broker associate license number 2001009430 and the entity application for IMPACT5 LLC once the audit reports as referenced in Paragraph 19A have been received from the CPA/Accountant and approved by MREC.

D. Respondent shall keep the MREC apprised at all times, in writing, of Respondent's current mailing addresses, e-mail address (if any), and telephone numbers at each

place of residence and business. Respondent shall notify the MREC within ten (10) days of any change in this information.

E. Respondent shall timely renew his real estate license(s), timely pay all fees required for license renewal and shall comply with all requirements necessary to maintain his license(s).

F. Respondent shall be prohibited from obtaining any additional real estate license(s) from the Commission, changing license status, or transferring his license without the prior written approval of the Commission. Respondent shall request such permission in writing.

G. Respondent shall meet in person with the Commission or its representative any such time or place as required by the Commission or its designee upon notification from the Commission or its designee. Said meetings will be at the Commission's discretion and may occur periodically during the probation period.

H. Respondent shall immediately submit documents showing compliance with the requirements of this Order to the Commission when requested by the Commission or its designee.

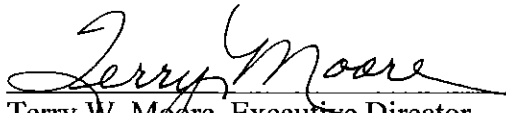
I. During the probationary period, Respondent shall accept and comply with unannounced visits from the Commission's representative to monitor compliance with the terms and conditions of this Order.

J. Respondent shall comply with all relevant provisions of Chapter 339, RSMo, as amended; all rules and regulations duly promulgated under all local, state and federal laws. "State" as used herein includes the State of Missouri and all other states and territories of the United States. Any cause to discipline Respondent's license as a Broker Associate under § 339.100.2, RSMo, as amended, that accrues during the disciplinary period shall constitute a violation of this Order.

K. Upon the expiration and successful completion of the disciplinary period, Respondent's respective real estate Broker Associate license shall be fully restored if all requirements of law have been satisfied; provided, however, that in the event the MREC determines that Respondent has violated any term or condition of this Order, the MREC may, in its discretion, after an evidentiary hearing, vacate and set aside the discipline imposed herein and may suspend, revoke, or otherwise lawfully discipline Respondent's real estate Broker Officer license.

The Commission will maintain this Order as an open, public record of the Commission as provided in Chapters 339, 610 and 324, RSMo.

So Ordered this 9TH day of OCTOBER 2019.


Terry W. Moore, Executive Director
Missouri Real Estate Commission

**BEFORE THE
MISSOURI REAL ESTATE COMMISSION**

MISSOURI REAL ESTATE
COMMISSION
3605 Missouri Boulevard
P.O. Box 1339
Jefferson City, MO 65102

Petitioner,

No.

v.

THE RUTHERFORD GROUP, LLC
4445 Morgan Ford Rd.
St. Louis, MO 63116, and

JOEL W. RUTHERFORD
1308 Washington Ave.
St. Louis, MO 63103

Respondents.

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MREC

PROBATION VIOLATION COMPLAINT

Petitioner, Missouri Real Estate Commission ("MREC"), by and through its attorney, the Attorney General of Missouri, states its cause of action against The Rutherford Group, LLC ("Rutherford Group") and Joel W. Rutherford ("Rutherford") as follows:

1. The MREC was established pursuant to § 339.120, RSMo, for the purpose of executing and enforcing the provisions of §§ 339.010 to 339.180 and §§ 339.710 to 339.860, RSMo, (as amended), relating to real estate salespersons and brokers.

2. Rutherford holds an expired Broker Associate license, number 2001009430, that was issued on April 9, 2001 and expired on June 30, 2018, and expired Broker Associate

license number 2018011307, that was issued on 03/30/2018 and expired on June 30, 2018. The Rutherford Group holds an expired Real Estate Association license, number 2012029612, issued on August 22, 2012, and which expired on June 30, 2018.

3. The MREC filed a disciplinary action against the Respondents on August 3, 2017, which concluded with a disciplinary hearing, and the issuance of a *Findings of Fact, Conclusions of Law, and Disciplinary Order* by the MREC on October 24, 2018, in which the Respondents' real estate licenses were placed on probation for a period of four years. A true and correct copy of the Findings of Fact, Conclusions of Law, and Disciplinary Order is attached here as Exhibit 1, and is incorporated by this reference.

4. The MREC has jurisdiction over this matter pursuant to §324.042, RSMo, which states:

Any board, commission, or committee within the division of professional registration may impose additional discipline when it finds after hearing that a licensee, registrant, or permittee has violated any disciplinary terms previously imposed or agreed to pursuant to settlement. The board, commission, or committee may impose as additional discipline any discipline it would be authorized to impose in an initial disciplinary hearing.

5. The MREC has further jurisdiction pursuant to the Disciplinary Order ("Order") paragraph H, which states in relevant part:

[I]n the event the MREC determines that Respondents have violated any term or condition of this Order, the MREC may, in its discretion, after an evidentiary hearing, vacate and set aside the discipline imposed herein, and may suspend, revoke, or otherwise lawfully discipline Respondents' real estate broker associate or real estate association licenses.

6. The relevant terms of the disciplinary period are stated in the Order, in pertinent part, as follows:

A. Respondents shall, at their expense retain an approved CPA/Accountant to conduct audit reports for TWO (2) YEARS of the disciplinary period. Respondents shall, within fifteen (15) days of the effective date of this Order submit to the Commission office in writing a list of at least three CPAs/Accountants, including name, address, and relationship to the Respondents. . . . The first such quarterly audit report shall begin with the quarter ending December 31, 2018 and continue through and conclude with the quarter ending December 31, 2020. Further, within 30 days of completion of each quarterly audit report, the CPA/Accountant conducting and completing the audit report will mail to the Commission office by certified mail, return receipt requested, a signed statement from the CPA/Accountant confirming that his/her firm completed a reconciliation of the accounts and matched the reconciled balance to the check register and the total of all reported owner and/or tenant balances. . . .

B. Respondents are hereby ordered to renew broker associate license number 2001009430 and real estate association license number 2012029612 with 45 days of the date of this order. Thereafter, Respondents shall timely renew their real estate license, timely pay all fees required for license renewal, and shall comply with all requirements necessary to maintain their licenses. Respondents cannot apply for additional real estate licenses or change current licenses without written approval of the commission.

7. Respondents failed to submit a list of three CPAs/Accountants to the Commission for approval to conduct quarterly audits of their business within fifteen days of the date of the Order, pursuant to paragraph A of the Order, in violation of the terms of the

disciplinary period. Thus cause exists to further discipline Respondents' real estate licenses pursuant to paragraph H of the Order, and § 324.042, RSMo.

8. Respondents failed to submit, or cause to be submitted, a quarterly audit by January 30, 2019, for the quarter ending on December 31, 2018, pursuant to paragraph A of the order, in violation of the terms of the disciplinary period. Thus cause exists to further discipline Respondents' real estate licenses pursuant to paragraph H of the Order, and § 324.042, RSMo.

9. Respondents failed to renew broker associate license number 2001009430, and real estate association license number 2012029612 within 45 days of the date of the Order (by December 9, 2018), pursuant to paragraph A of the Order, in violation of the terms of the disciplinary period. Thus cause exists to further discipline Respondents' real estate licenses pursuant to paragraph H of the Order, and § 324.042, RSMo.

WHEREFORE, Petitioner requests the MREC to hold a hearing to determine whether violations of the terms of the Order have occurred, and it may impose disciplinary action under § 324.042, RSMo, for the violations noted above, and for other such relief as the Commission deems appropriate.

Respectfully submitted,

ERIC S. SCHMITT
Attorney General

/s/ Ross Keeling

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Attorneys for Petitioner

BEFORE THE MISSOURI REAL ESTATE COMMISSION

MISSOURI REAL ESTATE COMMISSION

Petitioner,

v.

JOEL W RUTHERFORD and
THE RUTHERFORD GROUP LLC
Respondents.

No. 17-1266 RE

FINDINGS OF FACT, CONCLUSIONS OF LAW
AND DISCIPLINARY ORDER

On or about June 19, 2018, the Administrative Hearing Commission entered its Decision in the case of *Missouri Real Estate Commission v. Joel W. Rutherford and The Rutherford Group LLC*, No. 16-2484 RE. In that Decision, the Administrative Hearing Commission found that Respondent Joel W. Rutherford's real estate broker associate licenses (license nos. 2001009430 and 2018011307) and The Rutherford Group LLC license (license no. 2012029612) are subject to disciplinary action by the Missouri Real Estate Commission ("Commission") pursuant to § 339.100.2 (1), (2), (3), (15), and (16), RSMo.¹

The Commission has received and reviewed the record of the proceedings before the Administrative Hearing Commission including the Decision of the Administrative Hearing Commission. The record of the Administrative Hearing Commission is incorporated herein by reference in its entirety.

Pursuant to notice and §§ 621.110 and 339.100.3, RSMo, the Commission held a hearing on October 10, 2018, at the Division of Professional Registration, 3605 Missouri Boulevard, Jefferson City, Missouri, for the purpose of determining the appropriate disciplinary action

¹ All statutory references are to the Revised Statutes of Missouri 2000, as amended, unless otherwise indicated.

against Respondent's license. All of the members of the Commission were present throughout the meeting except Charles Misko. Further, each member of this Commission has read the Decision of the Administrative Hearing Commission. The Commission was represented by Assistant Attorney General Ross Keeling. Respondents having received proper notice and opportunity to appear, Respondent Joel W. Rutherford did appear in person without legal counsel. Respondent The Rutherford Group LLC was not represented by legal counsel. After being present and considering all of the evidence presented during the hearing, the Commission issues the following Findings of Facts, Conclusions of Law and Order.

Based upon the foregoing the Commission hereby states:

I.

FINDINGS OF FACT

1. The Commission is an agency of the state of Missouri created and established pursuant to § 339.120, RSMo, for the purpose of licensing all persons engaged in the practice as a real estate broker or salesperson in this state. The Commission has control and supervision of the licensed occupations and enforcement of the terms and provisions of §§ 339.010-339.205 and 339.710-339.855, RSMo.

2. The Commission hereby adopts and incorporates by reference the Decision, and the record of the Administrative Hearing Commission in *Missouri Real Estate Commission v. Joel W. Rutherford and The Rutherford Group LLC*, Case No. 17-1266 RE, issued June 19, 2018, in its entirety and takes official notice thereof.

3. The Commission set this matter for disciplinary hearing and served notice of the disciplinary hearing upon Respondents in a proper and timely fashion. Respondent Joel W. Rutherford did appear in person without legal counsel and Respondent The Rutherford Group LLC was not represented by legal counsel at the hearing before the Commission.

4. This Commission licensed Respondent Joel W. Rutherford as a real estate broker associate, license numbers 2001009430 and 2018011307 and The Rutherford Group LLC, real estate association, license number 2012029612. Respondents' licenses were not current at all times relevant to this proceeding. On June 30, 2016 Respondents' real estate licenses expired.

II.

CONCLUSIONS OF LAW

5. This Commission has jurisdiction over this proceeding pursuant to §§ 621.110 and 339.100, RSMo.

6. The Commission expressly adopts and incorporates by reference the Decision issued by the Administrative Hearing Commission dated June 19, 2018, in *Missouri Real Estate Commission v. Joel W. Rutherford and The Rutherford Group LLC*, Case No. 17-1266 RE, takes official notice thereof, and hereby enters its Conclusions of Law consistent therewith.

7. As a result of the foregoing, and in accordance with the Administrative Hearing Commission's Decision dated June 19, 2018, Respondent's real estate broker associate license, numbers 2001009430 and 2018011307, and real estate association license number 2012029612 are subject to disciplinary action by the Commission pursuant to § 339.100.2 (1), (2), (3), (15), and (16), RSMo.

8. The Commission has determined that this Order is necessary to ensure the protection of the public.

III.

ORDER

Having fully considered all the evidence before the Commission, and giving full weight to the Decision of the Administrative Hearing Commission, it is the **ORDER** of the Commission that the real estate broker associate licenses of Joel W. Rutherford (license nos. 2001009430 and

2018011307) and the real estate association license of The Rutherford Group LLC (license no 2012029612) are hereby placed on **FOUR (4) YEARS' PROBATION**. During Respondents' probation, Respondents shall be entitled to practice under their respective licenses provided that Respondents adheres to all of the terms stated herein. The period of probation shall constitute the "disciplinary period."

The terms and conditions of the disciplinary period are as follows:

A. Respondents shall, at their expense retain an approved CPA/Accountant to conduct and complete the quarterly audit reports for **TWO (2) YEARS** of the disciplinary period. Respondents shall, within fifteen (15) calendar days of the effective date of this Order submit to the Commission office in writing a list of at least three CPAs/Accountants, including name, address, and relationship to Respondents. The Commission may approve one or more the listed CPAs/Accountants or may require Respondents, on grounds that are reasonable, to submit additional names for consideration and approval. The first such quarterly audit report shall begin with the quarter ending December 31, 2018 and continue through and conclude with the quarter ending December 31, 2020. Further, within 30 days of completion of each quarterly audit report, the CPA/Accountant conducting and completing the audit report will mail to the Commission office by certified mail, return receipt requested, a signed statement from the CPA/Accountant confirming that his/her firm completed a reconciliation of the accounts and matched the reconciled balance to the check register and the total of all reported owner and/or tenant balances. All documents necessary to provide the reconciliation should be submitted with the CPA's/Accountant's statement. If the CPA/Accountant should find that the three-way reconciliation does not match, the CPA/Accountant report should include the details and documentation.

B. Respondents are hereby ordered to renew broker associate license number 2001009430 and real estate association license number 2012029612 with 45 days of the date of this order. Thereafter, Respondents shall timely renew their real estate licenses, timely pay all fees required for license renewal, and shall comply with all requirements necessary to maintain their licenses. Respondents cannot apply for additional real estate licenses or change current licenses without the written approval of the Commission.

C. Respondents shall keep the MREC apprised at all times, in writing, of any criminal court case outcomes and any civil court case outcomes related to real estate matters or that could affect the status of Respondents real estate licenses.

D. Respondents shall keep the MREC apprised at all times, in writing, of Respondents' current addresses and telephone numbers at each place of residence and business. Respondents shall notify the MREC within ten (10) days of any change in this information.

D. Respondents shall meet in person with the Commission or its representative any such time or place as required by the Commission or its designee upon notification from the Commission or its designee. Said meetings will be at the Commission's discretion and may occur periodically during the probation period.

E. Respondents shall immediately submit documents showing compliance with the requirements of this Order to the Commission when requested by the Commission or its designee.

F. During the probationary period, Respondents shall accept and comply with unannounced visits from the Commission's representative to monitor compliance with the terms and conditions of this Order.

G. Respondents shall comply with all relevant provisions of Chapter 339, RSMo, as amended; all rules and regulations duly promulgated under all local, state and federal laws.

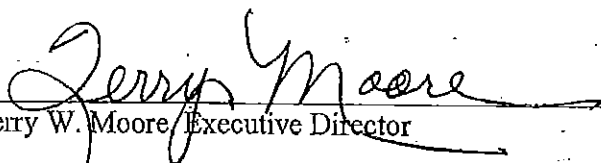
"State" as used herein includes the State of Missouri and all other states and territories of the United States. Any cause to discipline Respondents' licenses as a broker associate and real estate association under § 339.100.2, RSMo, as amended, that accrues during the disciplinary period shall constitute a violation of this Order.

H. Upon the expiration and successful completion of the disciplinary period, Respondents' respective real estate broker associate and real estate association licenses shall be fully restored if all requirements of law have been satisfied; provided, however, that in the event the MREC determines that Respondents have violated any term or condition of this Order, the MREC may, in its discretion, after an evidentiary hearing, vacate and set aside the discipline imposed herein and may suspend, revoke, or otherwise lawfully discipline Respondents' real estate broker associate or real estate association licenses.

The Commission will maintain this Order as an open, public record of the Commission as provided in Chapters 339, 610 and 324, RSMo.

SO ORDERED, EFFECTIVE THIS 24th DAY OF OCTOBER, 2018.

MISSOURI REAL ESTATE COMMISSION


Terry W. Moore, Executive Director